

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDGE CAPTURE L.L.C., and EDGE
SPECIALISTS, L.L.C.,

Plaintiffs,

V.

BARCLAYS BANK PLC, BARCLAYS
CAPITAL INC., UBS AG, UBS
FINANCIAL SERVICES INC., UBS
SECURITIES, L.L.C., WOLVERINE
TRADING, L.L.C., AND WOLVERINE
EXECUTION SERVICES, L.L.C.,

Defendants.

Civil Action No. 09-CV-1521

JURY TRIAL DEMANDED

Judge Charles R. Norgle, Sr.

Magistrate Judge Denlow

**PLAINTIFFS EDGE CAPTURE L.L.C.'S AND EDGE SPECIALISTS, L.L.C.'S
MOTION TO COMPEL THE WOLVERINE DEFENDANTS TO COMPLY WITH
LOCAL PATENT RULE 2.1(b)(1), TO EXTEND THE DEADLINE FOR EDGE TO SERVE
ITS LPR 2.2 INITIAL INFRINGEMENT CONTENTIONS REGARDING WOLVERINE,
AND TO ADOPT THE BRIEFING SCHEDULE FROM D.E. 194 FOR THIS MOTION**

Edge brings this motion pursuant to Federal Rule of Civil Procedure 37 to compel Wolverine Trading, L.L.C. and Wolverine Execution Services, L.L.C. (collectively “Wolverine”) to comply with their obligations under LPR 2.1(b)(1) and immediately produce documents “sufficient to show the operation and construction of all aspects or elements” of the trading systems that engaged in the trades described in the Amended Complaint.

Furthermore, because Edge’s LPR 2.2 Initial Infringement Contentions are due on July 20, 2011, and are meant to take into consideration Wolverine’s LPR 2.1 Initial Disclosures, Edge also respectfully requests that the Court extend the deadline for Edge to serve its LPR 2.2 Initial Infringement Contentions regarding Wolverine from July 20 to fourteen (14) days after Wolverine satisfies its disclosure obligations under LPR 2.1(b)(1).

Lastly, Edge proposes that the parties follow the same briefing schedule that the Court ordered for Edge’s motion to compel against Barclays and UBS. (D.E. 194.) Under that schedule, Wolverine’s Response would be due on or before July 29, 2011 and Edge’s Reply would be do on or before August 5, 2011.

This Motion is based upon this Motion, the attached Notice of Motion and Memorandum of Law, the papers and pleadings on file in this action, and such other and further evidence as may subsequently be presented to the Court.

Dated: July 14, 2011

Respectfully submitted,

By: /s/ Patrick G. Burns

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EDGE CAPTURE L.L.C. AND EDGE

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on July 14, 2011, he caused a true and correct copy of **PLAINTIFFS EDGE CAPTURE L.L.C.'S AND EDGE SPECIALISTS, L.L.C.'S MOTION TO COMPEL THE WOLVERINE DEFENDANTS TO COMPLY WITH LOCAL PATENT RULE 2.1(b)(1), TO EXTEND THE DEADLINE FOR EDGE TO SERVE ITS LPR 2.2 INITIAL INFRINGEMENT CONTENTIONS REGARDING WOLVERINE, AND TO ADOPT THE BRIEFING SCHEDULE FROM D.E. 194 FOR THIS MOTION** to be served on the below parties through the CM/ECF system:

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/s/ Patrick G. Burns
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